Remarks/Arguments

This communication is considered fully responsive to the non-final Office action mailed June 6, 2003. Claims 1-20 were examined and stand rejected. Claims 1, 16, and 17 were amended. No claims were canceled. New claims 21-37 have been added. Reexamination and reconsideration of claims 1-37 are respectfully requested.

Claim Amendments

Claims 1, 16, and 17 have been amended to emphasize that the postback input on which recited operations operate is received from the client. The Applicant asserts that the amendments do not impact the scope of the claims because postback input is already defined as "received from a client" in the preamble of claim 1. Moreover, this feature is clearly supported by the description of FIG. 6, which "illustrates a process flow diagram representing server-side processing of a page object and other control objects", in which operations 608 and 610 process postback input received from the client. Pg. 25, lines 14-20; pg. 29, line 6 to pg. 31, line 16 (emphasis added). See also the description of operation 206 in FIG. 2 and the description of the operation in FIG. 8, particularly operations 810, 812, and 814.

New claims 21-27 have been added.

Claim Rejections – 35 U.S.C. § 102

Claims 1-4, 7, 12, and 16-19 stand rejected under 35 U.S.C. § 102(e) as being purportedly anticipated by Ferris, WO 98, 44695 ("Ferris"). The Applicant respectfully traverses this rejection.

Ferris discloses a method and apparatus for updating and synchronizing information between client and a server. Ferris proposes updating and

synchronization by integrating applets running on a client with applications running on a server. Ferris, pg. 8, line 3. A client-side applet called the Applet Group Controller (see Applet Group Controller 202 in FIG. 3) includes a client-side Association. Ferris, pg. 8, line 19 to pg. 9, line 2. Responsive to invocation of a client-side event by a client-side control created by another client-side applet, an Association instructs a client-side Action Coordinator to transmit a list of all the values received from the user and an associated action to the server. Id. Responsive to receipt of the values and the action, the server utilizes the values, invokes the action, and returns the result of the invoked action (e.g., a new web page or a package of the values) back to the client. Ferris, pg. 9, lines 3-10.

The Applicant cannot overemphasize the "client-side" focus of the Ferris approach. In FIGs. 2 and 3, for example, all of the applets, including the Applet Group Controller 202, Associations 302, the Action Coordinator 301, and Applets 201, operate only on the client side. Client data from these client-side applets is transmitted to the server via communication line 203.

However, Ferris fails to disclose or suggest server-side control objects. Furthermore, the recited operations of claim 1 are not performed by Ferris on the postback input received from the client. As such, the systems and techniques disclosed and suggested in Ferris fail to anticipate or make obvious the recited invention.

Claim 1 clearly recites operations involving server-side control objects. Although Ferris discloses objects (namely data storage objects) on a server, Ferris fails to disclose or suggest "server-side control objects". Server-side control objects "logically correspond to client-side user interface elements" and generate authoring language code at the server. Pg. 6, line 22 to pg. 7, line 1. Ferris only

teaches client-side applets that correspond to text fields, push buttons, toggle buttons, etc. (Ferris, pg. 21, line 4-23) and does not teach server-side control objects. There can be no reasonable comparison between these two approaches. In fact, the Ferris approach and that of this subject application are orthogonal in both concept and implementation: Ferris teaches operations of a client, whereas claim 1 recites operations of a server.

Claim 1 also recites examining, passing, and processing operations that are performed on postback input that is received from a client. Therefore, these recited operations are not performed by the client. In contrast, Ferris only teaches using the client-side applets that operate on information at the client, after which the information is set to the server. Thus, Ferris fails to disclose or suggest the recited examining, passing, and processing of the postback input received from the client.

For at least the foregoing reasons, claim 1 is believed to be allowable over any of the cited references. Accordingly, allowance of claim 1 is earnestly requested.

Claims 2-4, 7, and 12 depend from claim 1, which is believed to be allowable. Therefore, claims 2-4, 7, and 12 are believed to be allowable for at least the same reasons as claim 1. Withdrawal of the rejection of claims 2-4, 7, and 12 is respectfully requested.

Claims 16 and 17 stand rejected for the same reasons as claim 1. Claims 16 and 17 have been amended in the same manner as claim 1 and are believed to be allowable for at least the same reasons as claim 1. Withdrawal of the rejection of claims 16 and 17 is respectfully requested.

Claim 18 recites "creating a plurality of server-side control objects in a server-side control object hierarchy". The Office references Ferris, pg. 22, lines 8-25, to support its rejection of claim 4, which also includes a server-side control object hierarchy. However, the cited paragraph merely describes applets on the client. All processing described in the cited paragraph of Ferris is performed on the client, and absolutely no server-side control objects are described. Altogether, Ferris fails to disclose or suggest any server-side control objects, much less a server-side control object hierarchy, as recited in claim 18. Therefore, Ferris fails to anticipate or make obvious the computer program product of claim 18. As such claim 18 is believed to be allowable. Withdrawal of the rejection of claim 18 is respectfully requested.

Claim 19 depends from claim 18, which is believed to be allowable. Therefore, claim 19 is believed to be allowable for at least the same reasons as claim 18. Withdrawal of the rejection of claim 19 is respectfully requested.

Claim Rejections – 35 U.S.C. § 103

Claims 5, 6, 8-11, 13-15 and 20 stand rejected under 35 U.S.C. § 103(a) as being purportedly unpatentable over Ferris. The Applicant respectfully traverses this rejection.

Claims 5, 6, 8-11, and 13-15 depend from claim 1, which is believed to be allowable. Therefore, claims 5, 6, 8-11, and 13-15 are believed to be allowable for at least the same reasons as claim 1. Withdrawal of the rejection of claims 5, 6, 8-11, and 13-15 is respectfully requested.

Claim 20 depends from claim 18, which is believed to be allowable. Therefore, claim 20 is believed to be allowable for at least the same reasons as claim 18. Withdrawal of the rejection of claim 20 is respectfully requested.

New Claims

New claims 21-37 are added and are believed patentable over the cited references for at least one of the reasons specified for claims 1-20.

Conclusion

The Applicant respectfully requests that a timely Notice of Allowance for claims 1-37 be issued in this matter.

Respectfully Submitted,

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By: _____

Richard J. Holzer, Jr.
Reg. No. 42,668
(509) 324-9256